Line 36 must also be allocated among analog and digital. Within the digital category further allocations must be made between DS1, DS3 and other digital. Furthermore, the revenues arbitrarily allocated to voice grade, DS1 and DS3 must be further allocated among the pricing zones.

Mandating a standard method would result in a further micro-management of the LECs, and must be avoided. Either method produces a reasonable process to identify the USF obligation by basket. For example, an LEC that has not implemented pricing zones would not encounter as many allocations as an LEC with pricing zones. In addition, LECs with pricing zones will have different levels of allocations. For example, within Pacific, the zones are limited to combined switched and special. Within SWBT, DS1 and DS3 zones apply to special, switched and combined.

VI. CONCLUSION

For the foregoing reasons, the investigation in this docket should be concluded without further action by the Commission as to the tariffs of the SBC Companies.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

PACIFIC BELL

NEVADA BELL

BY:

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February 27, 1998

Certificate of Service

I, Mary Ann Morris, hereby certify that the foregoing, "Reply Comments of Southwestern Bell Telephone Company" has been filed this 27th day of February, 1998 to the Parties of Record.

Mary Ann Morris

February 27, 1998

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RECEIVED

FEB 27 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

SWBT Line Counts

	<u> 1996</u>
Primary Residential	103,661,796
Single Line Business	4,152,828
Total Primary Res & Single Line Bus	107,814,624
Non Primary Residential	9,656,712
BRI ISDN	835,572
Total Non Primary Res & BRI ISDN	10,492,284

Pacific Line Counts

	<u>1996</u>
Primary Residential	87,323,331
Single Line Business	4,763,351
Total Primary Res & Single Line Bus	92,086,682
Non Primary Residential	2,373,481
BRI ISDN	813.015
Total Non Primary Res & BRI ISDN	3,186,496

Nevada Line Counts

Total 1996

Primary Residential Single Line Business Total Primary Res & Single Line Bus	2,066,181 <u>80,995</u> 2,147,176
Non Primary Residential	161,748
BRI ISDN	<u> 11.715</u>
Total Non Primary Res & BRI ISDN	173,463

	PART I. L	INE COUN	T DATA FO	RMATION
	Sources	Search	Collection	Time Period
Primary Residential Lines	D3	S1	C2	(T1) 1996
Single Lines Business	D3	S1	C2	(T1) 1996
Non-Primary Residential Lines	D3	S1	C2	(T1) 1996
BRI-ISDN Lines	D1	S1	C2	(T1) 1996

PART II. LINE COUNT DATA IDENTIFICATION

Location or Premise: How was location used to classify lines?

(L3) Billing address

Customer Name: How was a name designation used to classify line count data?

(B1) Customer/ Subscriber - Full name as it appears on billing records.

Single Line Business & BRI ISDN: How was number coding used to classify these types of lines? (N5) Field Indicator identifies type of lines.

Number Codes for Primary & Non Primary Res Lines: How was number coding used to classify these type of lines? (A0) The following is the criteria that SWBT used in determining whether a residential lines is primary or nonprimary. A line is considered a primary residential line if the customer's account record contains a customer type of "11". In addition, a customer type of "12" is considered non-primary if the account record denotes a customer type of "12" and the Additional Line Field Indicator (ADL FID) is "1".

A "1" in the first field of the customer type indicates a single line residential customer. A "2" in this field indicates a multiline arrangement or a group-billed account.

The ADL FID is populated with a "0" if no ADL FID is associated with the line and a "1" if an ADL FID indicator is associated with the line. The ADL FID indicator is populated with a "1" for any line in a single-family living unit after the first line.

Example based on SWBT's criteria:

Customer	Location	Account <u>Number</u>	Customer Type ADL	FID	NonPrimary (N) or Primary (P)
Jane Doe	123 Cherry St.	555-1234	12	0	Р
		555-1235	12	1	N
Jim Jones	457 Hill St.	555-9876	11	0	Р
Anita Jones	457 Hill St.	555-9999	11	1	Р

Primary or Nonprimary Decision on Page 5 of Appendix B:

Since SWBT based it's primary / nonprimary decision on specific fields in the account information and such fields are not provided in the FCC's information, SWBT is unable to identify the FCC's examples as primary or nonprimary utilizing SWBT's criteria.

	PART I. L	PART I. LINE COUNT DATA FORMATION				
	Sources	Search	Collection	Time Period		
Primary Residential Lines	D1	S0	C2	(T1) 1997		
Single Lines Business	D1	S0	C2	(T1) 1997		
Non-Primary Residential Lines	D1	S0	C2	(T1) 1997		
BRI-ISDN Lines	D1	so	C2	(T1) 1997		

PART II. LINE COUNT DATA IDENTIFICATION

Location or Premise: How was location used to classify lines?

(L3) Billing address

Customer Name: How was a name designation used to classify line count data?

(B1) Customer/ Subscriber - Full name as it appears on billing records.

Single Line Business & BRI ISDN: How was number coding used to classify these types of lines?

(N5) Field Indicator identifies type of lines.

Number Codes for Primary & Non Primary Res Lines: How was number coding used to classify these type of lines? (A0) The following is the criteria that Pacific used in determining whether a residential lines is primary or nonprimary. A line is considered a primary residential line if the customer's account record contains a customer type of "11". In addition, a customer type of "12" is considered non-primary if the account record denotes a customer type of "12" and the Additional Line Field Indicator (ADL FID) is "1".

A "1" in the first field of the customer type indicates a single line residential customer. A "2" in this field indicates a multiline arrangement or a group-billed account.

The ADL FID is populated with a "0" if no ADL FID is associated with the line and a "1" if an ADL FID indicator is associated with the line. The ADL FID indicator is populated with a "1" for any line in a single-family living unit after the first line.

Example based on Pacific's criteria:

Customer	Location	Account <u>Number</u>	Customer Type ADL	EID	NonPrimary (N) or Primary (P)
Jane Doe	123 Cherry St.	555-1234	12	0	Р
		555-1235	12	1	N
Jim Jones	457 Hill St.	555-9876	11	0	Р
Anita Jones	457 Hill St.	555-9999	11	1	Р

Primary or Nonprimary Decision on Page 5 of Appendix B:

Since Pacific based it's primary / nonprimary decision on specific fields in the account information and such fields are not provided in the FCC's information, Pacific is unable to identify the FCC's examples as primary or nonprimary utilizing Pacific's criteria.

Nevada Bell

	Part I Line Count Data Formation				
	Sources	Search	Collection	Time Period	
Primary Residential Lines	D8 (1)	S2	C1	T1 (1996)	
Single Line Business	D1	S1	C1	T1 (1996)	
Non-Primary Residential Lines	D8 (1)	S0 (1)	C1	T1 (1996)	
BRI-ISDN Lines	D1	S1	C1	T1 (1996)	

(1) At Nevada Bell, non-primary residential lines have been steadily increasing as a percentage of total residential lines. A study was performed which took non-primary lines as a percentage of total residential lines at 12/31/96. This percentage was applied to total residential lines for Jan-Dec 1996, resulting in a non-primary line count total for 1996. Total residential lines less these allocated non-primary lines resulted in primary residential lines for 1996.

	Part II Line Count Data Identification				
	Customer				
	Location	Name	Number Codes		
Primary Residential Lines	L3	B1	A0 (2)		
Single Line Business	L3	B1	N5		
Non-Primary Residential Lines	L3	B1	A0 (2)		
BRI-ISDN Lines	L3	B1	N5		

(2) A line is considered a primary residential line if the residential customer's telephone number is the same as the billed telephone number. A line is considered a non-primary residential line if the residential customer's telephone number is not the same as the billed telephone number.

Nevada Bell

Customer Name	Location	Telephone Number	Billing Number	Non-Primary (N) or Primary (P)
John Brown	123 Cherry St.	555-1234	555-1234	Р
John Brown	123 Cherry St.	555-1235	555-1234	N
Jane Doe	456 Apple Road	555-2345	555-2345	Р
Bob Doe	456 Apple Road	555-2346	555-2345	N
Jim Jones	789 Berry Hill	555-3456	555-3456	Р

Primary or Nonprimary Decision on Page 5 of Appendix B:

Since Nevada based it's primary / nonprimary decision on specific fields in the account information and such fields are not provided in the FCC's information, Nevada is unable to identify the FCC's examples as primary or nonprimary utilizing Nevada's criteria.

RCCL-1 SWBT PAGE 1 OF 24

			PAGE 1 OF 24		
	CALCULATION OF CARRIER COMMON	LINE RATE CAP	SWBT 1991 Revised Annual Filing Effect 8/12/91	1991 AF with Prescribed EUCL	
			Trans No 2114		
			(A)	(B)	
STEP 1					
100	Terminating CCL Premium MOU		13,939,813,412	13,939,813,412	
110	Terminating CCL Non-Premium MOU		712,373,925	712,373,925	
120	Chargeable Terminating CCL Premium MOU	(Ln 100+(Ln110*.45))	14,260,381,678	14,260,381,678	
130	Originating CCL Premium MOU		10,840,900,811	10,840,900,811	
140	Originating CCL Non-Premium MOU		234,768,912	234,768,912	
150	Chargeable Originating CCL Premium MOU	(Ln 130 +(Ln140*.45))	10,946,546,821	10,946,546,821	
160	Term CCL Prem Capped Rates at last PCI Update		0.010200	0.010200	
170	Orig CCL Prem Capped Rates at last PCI Update		0.010000	0.010000	
180	Multiline Business EUCL Lines		32,308,152	32,308,152	
190	Res & Single Bus EUCL Lines		103,306,764	103,306,764	
200	Lifeline Lines		479,460	479,460	
210	Special Access Surcharge Lines		75,840	75,840	
220	Multiline Bus EUCL Rates at last PCI Update		4.9544	4.9544	
230	Res & Single Bus EUCL Rates at last PCI Update		3.50	3.50	
240	Lifeline Rates at last PCI Update		3.50	3.50	
250	Sp Access Surch Rates at last PCI Update		25.00	25.00	
255	Other CCL Revenues		0	(
260	CL Revenue at Capped (t-1) Rates		780,136,654	780,136,654	
STEP 2					
270	CCL Revenue at Capped (t-1) Rates		780,136,654	780,136,654	
280	CCL MOU for Base Year	(Ln100+Ln110+Ln130+Ln140)	25,727,857,060	25,727,857,060	
290	CL Rev/MOU(t-1)	(Ln 270/Ln 280)	0.030323	0.030323	
STEP 3					
300	CL PCI (t)		90.4100%	90.4100%	
310	CL PCI (t-1)		98.0100%	98.0100%	
320	1+% Change CL PCI	(1.0 + (Ln 300/Ln 310))	0.922457	0.92245	
330	CL Revenue/MOU (t)	(Ln 290 * Ln 320)	0.027971	0.02797	
STEP 4					
340	Base Demand * Proposed SLC's Prescribed '91 EUCL	= 4.98	522,165,403	526,042,38	
350	CCL MOU for Base Year	(Ln 280)	25,727,857,060		
360	1+g/2	(211 200)	1.029350		
370	SLC Revenue/MOU (t)	(Ln 340/(Ln 350 * Ln 360))	0.019717		
380	CCL Revenue/MOU (t)	(Ln 330 - Ln 370)	0.008254		
STEP 5		(211000 211070)	0.000201	0.00010	
		(l n 290)	25,727,857,060	25,727,857,06	
390 400	CCL MOU for Base Year	(Ln 280) (Ln 380 * Ln 390)			
400 410	CCL Rev at CCL Rev/MOU (t)	,	212,365,605 10,946,546,821		
	Chargeable Originating MOU	(Ln 150)			
420	Originating CCL Rev (rate = .01)	(Ln 410 * .01)	109,465,468		
430	Residual CCL Rev	(Ln 400 - Ln 420)	102,900,137		
440	Chargeable Terminating MOU	(Ln 120)	14,260,381,678		
450	Hypothetical Prem Term Rate Cap#1(Prem Orig=.01)	(Ln 430/Ln 440)	0.007216		
460	Total Chargeable MOU	(Ln 410 + Ln 440)	25,206,928,500		
470	Hypothetical Prem Term Rate Cap#2(if #1<.01)	(Ln 400/Ln 460)	0.008425		
480	Premium Terminating Rate Cap	(Ln 470 IF<.01 Else Ln 450)	0.008425	0.00827	

(CALCULATION OF CARRIER COMMON	LINE RATE CAP	SWBT 1991 Recast Annual Filing	1991 AF with Prescribed EUCL
		Filed 5/22/92.	No effective date Trans No 2114 (A)	(B)
STEP 1			(~)	(5)
	Terminating CCL Premium MOU		13,939,813,412	13,939,813,412
	Terminating CCL Non-Premium MOU		712,373,925	712,373,925
	Chargeable Terminating CCL Premium MOU	(Ln 100+(Ln110*.45))	14,260,381,678	14,260,381,678
	Originating CCL Premium MOU	(2	10,840,900,811	10,840,900,811
	Originating CCL Non-Premium MOU		234,768,912	234,768,912
	Chargeable Originating CCL Premium MOU	(Ln 130 +(Ln140*.45))	10,946,546,821	10,946,546,821
	Term CCL Prem Capped Rates at last PCI Update	(2,	0.010518	0.010518
	Orig CCL Prem Capped Rates at last PCI Update		0.010000	0.010000
	Multiline Business EUCL Lines		32,308,152	32,308,152
	Res & Single Bus EUCL Lines		103,306,764	103,306,764
	Lifeline Lines		479,460	479,460
i e	Special Access Surcharge Lines		75,840	75,840
220	Multiline Bus EUCL Rates at last PCI Update		4.9544	4.9544
230	Res & Single Bus EUCL Rates at last PCI Update		3.50	3.50
240	Lifeline Rates at last PCI Update		3.50	3.50
250	Sp Access Surch Rates at last PCI Update		25.00	25.00
255	Other CCL Revenues		0	20.00
260	CL Revenue at Capped (t-1) Rates		784,671,455	784,671,455
STEP 2	or novelide at capped (t 1) hates		701,071,100	101,071,100
270	CCL Revenue at Capped (t-1) Rates	<u> </u>	784,671,455	784,671,455
280	CCL MOU for Base Year	(Ln100+Ln110+Ln130+Ln140)	25,727,857,060	25,727,857,060
290	CL Rev/MOU(t-1)	(Ln 270/Ln 280)	0.030499	0.030499
STEP 3		(2112707217200)	0.000 100	3,333,33
300	CL PCI (t)		90.3531%	90.3531%
310	CL PCI (t-1)		97.9459%	97.9459%
320	1+% Change CL PCI	(1.0 + (Ln 300/Ln 310))	0.922480	0.922480
330	CL Revenue/MOU (t)	(Ln 290 * Ln 320)	0.028135	0.028135
STEP 4	or revenue moo (t)	(EIT 250 EIT 020)	0.020100	0.020100
340	Base Demand * Proposed SLC's Prescribed '91 EUCL	- 1 Q8	522,161,235	526,042,381
340	base belliand Floposed SLC's Fleschbed 91 EOCE	~ 4.30		JZU,U7Z,JU I
350	CCL MOU for Base Vear			
350 360	CCL MOU for Base Year	(Ln 280)	25,727,857,060	25,727,857,060
360	1+g/2	(Ln 280)	25,727,857,060 1.029350	25,727,857,060 1.029350
360 370	1+g/2 SLC Revenue/MOU (t)	(Ln 280) (Ln 340/(Ln 350 * Ln 360))	25,727,857,060 1.029350 0.019717	25,727,857,060 1.029350 0.019863
360 370 380	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 280)	25,727,857,060 1.029350	25,727,857,060 1.029350 0.019863
360 370 380 STEP 5	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370)	25,727,857,060 1.029350 0.019717 0.008418	25,727,857,060 1.029350 0.019863 0.008271
360 370 380 STEP 5 390	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060	25,727,857,060 1.029350 0.019863 0.008271 25,727,857,060
360 370 380 STEP 5 390 400	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t)	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674	25,727,857,060 1.029350 0.019863 0.008271 25,727,857,060 212,800,192
360 370 380 STEP 5 390 400 410	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821	25,727,857,060 1.029350 0.019863 0.008271 25,727,857,060 212,800,192 10,946,546,82
360 370 380 STEP 5 390 400 410 420	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01)	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821 109,465,468	25,727,857,060 1.029350 0.019863 0.008271 25,727,857,060 212,800,192 10,946,546,822 109,465,468
360 370 380 STEP 5 390 400 410 420 430	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821 109,465,468 107,105,206	25,727,857,060 1.029350 0.019863 0.008271 25,727,857,060 212,800,192 10,946,546,821 109,465,468 103,334,723
360 370 380 STEP 5 390 400 410 420 430 440	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821 109,465,468 107,105,206 14,260,381,678	25,727,857,060 1.029350 0.019863 0.00827 25,727,857,060 212,800,192 10,946,546,82 109,465,466 103,334,723 14,260,381,676
360 370 380 STEP 5 390 400 410 420 430 440 450	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU Hypothetical Prem Term Rate Cap#1(Prem Orig=.01)	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120) (Ln 430/Ln 440)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821 109,465,468 107,105,206 14,260,381,678 0.007511	25,727,857,060 1.029350 0.019863 0.00827 25,727,857,060 212,800,193 10,946,546,82 109,465,466 103,334,72 14,260,381,676 0.00724
360 370 380 STEP 5 390 400 410 420 430 440	1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL MOU for Base Year CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU	(Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120)	25,727,857,060 1.029350 0.019717 0.008418 25,727,857,060 216,570,674 10,946,546,821 109,465,468 107,105,206 14,260,381,678	25,727,857,060 1.029350 0.019863 0.008272 25,727,857,060 212,800,192 10,946,546,822 109,465,464 103,334,723 14,260,381,673 0.007244 25,206,928,500

	CALCULATION OF CARRIER COMMON LINE RATE CAP		SWBT 1991 Revised Annual Filing Effective 5/25/92 Trans No 2200	1991 AF with Prescribed EUCL
			(A)	(B)
STEP 1				210 446
100	Terminating CCL Premium MOU		13,939,813,412	13,939,813,412
110 120	Terminating CCL Non-Premium MOU		712,373,925	712,373,925
120	Chargeable Terminating CCL Premium MOU	(Ln 100+(Ln110*.45))	14,260,381,678	14,260,381,678
130	Originating CCL Premium MOU		10,840,900,811	10,840,900,811
140	Originating CCL Non-Premium MOU	· · · · · · · · · · · · · · · · · · ·	234,768,912	234,768,912
150	Chargeable Originating CCL Premium MOU	(Ln 130 +(Ln140*.45))	10,946,546,821	10,946,546,821
160	Term CCL Prem Capped Rates at last PCI Update		0.008592	0.008442
170	Orig CCL Prem Capped Rates at last PCI Update		0.008592	0.008442
180	Multiline Business EUCL Lines		32,308,152	32,308,152
190	Res & Single Bus EUCL Lines		103,306,764	103,306,764
200	Lifeline Lines		479,460	479,460
210	Special Access Surcharge Lines		75,840	75,840
220	Multiline Bus EUCL Rates at last PCI Update		4.8599	4.9800
230	Res & Single Bus EUCL Rates at last PCI Update		3.50	3.50
240	Lifeline Rates at last PCI Update		3.50	3.50
250	Sp Access Surch Rates at last PCI Update		25.00	25.00
255	Other CCL Revenues		0	ſ
260	CL Revenue at Capped (t-1) Rates		738,732,846	738,842,572
STEP 2				
270	CCL Revenue at Capped (t-1) Rates		738,732,846	738,842,572
280	CCL MOU for Base Year	(Ln100+Ln110+Ln130+Ln140)	25,727,857,060	25,727,857,060
290	CL Rev/MOU(t-1)	(Ln 270/Ln 280)	0.028713	0.028718
STEP 3				
300	CL PCI (t)		90.3531%	90.3531%
310	CL PCI (t-1)		90.3531%	90.3531%
320	1+% Change CL PCI	(1.0 + (Ln 300/Ln 310))	1.000000	1.00000
330	CL Revenue/MOU (t)	(Ln 290 * Ln 320)	0.028713	
STEP 4			<u></u>	
340	Base Demand * Proposed SLC's Prescribed '91 EUCL	= 4.98	522,161,235	526,042,38
350	CCL MOU for Base Year	(Ln 280)	25,727,857,060	
360	1+g/2	(11111111111111111111111111111111111111	1.000000	
370	SLC Revenue/MOU (t)	(Ln 340/(Ln 350 * Ln 360))	0.020296	
380	CCL Revenue/MOU (t)	(Ln 330 - Ln 370)	0.008418	
STEP 5	GOE MOTORIAGE (M)	(200 200 200 200 200 200 200 200 200 200		
390	CCL MOU for Base Year	(Ln 280)	25,727,857,060	25,727,857,06
400	CCL Rev at CCL Rev/MOU (t)	(Ln 380 * Ln 390)	216,571,611	
410	Chargeable Originating MOU	(Ln 150)	10,946,546,821	
420	Originating CCL Rev (rate = .01)	(Ln 410 * .01)	109,465,468	
420 430	Residual CCL Rev	(Ln 410 * .01) (Ln 400 - Ln 420)	107,106,143	
)		,		
440 450	Chargeable Terminating MOU	(Ln 120)	14,260,381,678	
450	Hypothetical Prem Term Rate Cap#1(Prem Orig=.01)	(Ln 430/Ln 440)	0.007511	
460	Total Chargeable MOU	(Ln 410 + Ln 440)	25,206,928,500	
<u>-</u>	11 0 0 15 T 5 0 0000 04	(Ln 400/Ln 460)	0.008592	0.0084
470 480	Hypothetical Prem Term Rate Cap#2(if #1<.01) Premium Terminating Rate Cap	(Ln 470 IF<.01 Else Ln 450)	0.008592	

	CALCULATION OF CARRIER COMMON	LINE RATE CAP	SWBT 1992 Annual Filing Effective 7/1/92 Trans No 2207	1992 AF with Prescribed EUCL
			(A)	(B)
STEP 1				
100	Terminating CCL Premium MOU		14,983,878,311	14,983,878,311
110	Terminating CCL Non-Premium MOU		451,399,542	451,399,542
120	Chargeable Terminating CCL Premium MOU	(Ln 100+(Ln110*.45))	15,187,008,105	15,187,008,105
130	Originating CCL Premium MOU		11,577,350,040	11,577,350,040
140	Originating CCL Non-Premium MOU		188,642,208	188,642,208
150	Chargeable Originating CCL Premium MOU	(Ln 130 +(Ln140*.45))	11,662,239,034	11,662,239,034
160	Term CCL Prem Capped Rates at last PCI Update		0.008592	0.008442
170	Orig CCL Prem Capped Rates at last PCI Update		0.008592	0.008442
180	Multiline Business EUCL Lines		34,266,192	34,266,192
190	Res & Single Bus EUCL Lines		104,872,322	104,872,322
200	Lifeline Lines		596,782	596,782
210	Special Access Surcharge Lines		64,980	64,980
220	Multiline Bus EUCL Rates at last PCI Update		4.86172808	4.98
230	Res & Single Bus EUCL Rates at last PCI Update		3.50	3.50
240	Lifeline Rates at last PCI Update		3.50	3.50
250	Sp Access Surch Rates at last PCI Update		25.00	25.00
255	Other CCL Revenues		0	0
260	CL Revenue at Capped (t-1) Rates		768,048,003	768,076,861
STEP 2				
270	CCL Revenue at Capped (t-1) Rates		768,048,003	768,076,861
280	CCL MOU for Base Year	(Ln100+Ln110+Ln130+Ln140)	27,201,270,101	27,201,270,101
290	CL Rev/MOU(t-1)	(Ln 270/Ln 280)	0.028236	0.028237
STEP 3				
300	CL PCI (t)		86.0149%	86.0149%
310	CL PCI (t-1)		90.3531%	90.3531%
320	1+% Change CL PCI	(1.0 + (Ln 300/Ln 310))	0.951986	0.951986
330	CL Revenue/MOU (t)	(Ln 290 * Ln 320)	0.026880	0.026881
STEP 4				5.15.500.010
340	Base Demand * Proposed SLC's Prescribed '92 EUCL		530,152,233	545,523,943
350	CCL MOU for Base Year	(Ln 280)	27,201,270,101	27,201,270,101
360	1+g/2		1.014861	1.014861
370	SLC Revenue/MOU (t)	(Ln 340/(Ln 350 * Ln 360))	0.019205	0.01976
380	CCL Revenue/MOU (t)	(Ln 330 - Ln 370)	0.007675	0.007120
STEP 5				
390	CCL MOU for Base Year	(Ln 280)	27,201,270,101	27,201,270,101
400	CCL Rev at CCL Rev/MOU (t)	(Ln 380 * Ln 390)	208,781,796	193,662,644
410	Chargeable Originating MOU	(Ln 150)	11,662,239,034	11,662,239,034
420	Originating CCL Rev (rate = .01)	(Ln 410 * .01)	116,622,390	116,622,390
430	Residual CCL Rev	(Ln 400 - Ln 420)	92,159,406	
440	Chargeable Terminating MOU	(Ln 120)	15,187,008,105	
450	Hypothetical Prem Term Rate Cap#1(Prem Orig=.01)	(Ln 430/Ln 440)	0.006068	
460	Total Chargeable MOU	(Ln 410 + Ln 440)	26,849,247,139	
470	Hypothetical Prem Term Rate Cap#2(if #1<.01)	(Ln 400/Ln 460)	0.007776	
480	Premium Terminating Rate Cap	(Ln 470 lF<.01 Else Ln 450)	0.007776	0.00721

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	CALCULATION OF CARRIER COMMON LINE RATE CAP		SWBT 1992 NECA Support Effect 2/11/93	1992 AF with Prescribed EUCL	
			Trans No 2257		
TED 4			(A)	(B)	
STEP 1	= : :: 20: 5 : : :: :: :: : : : : : : : : : : :				
	Terminating CCL Premium MOU		14,983,878,311	14,983,878,311	
	Terminating CCL Non-Premium MOU		451,399,542	451,399,542	
	Chargeable Terminating CCL Premium MOU	(Ln 100+(Ln110*.45))	15,187,008,105	15,187,008,105	
	Originating CCL Premium MOU		11,577,350,040	11,577,350,040	
	Originating CCL Non-Premium MOU		188,642,208	188,642,208	
	Chargeable Originating CCL Premium MOU	(Ln 130 +(Ln140*.45))	11,662,239,034	11,662,239,034	
	Term CCL Prem Capped Rates at last PCI Update		0.007776	0.007213	
	Orig CCL Prem Capped Rates at last PCI Update		0.007776	0.007213	
	Multiline Business EUCL Lines		34,266,192	34,266,192	
	Res & Single Bus EUCL Lines		104,872,322	104,872,322	
	Lifeline Lines		596,782	596,782	
	Special Access Surcharge Lines		64,980	64,980	
220	Multiline Bus EUCL Rates at last PCI Update		4.65140302	5.10	
230	Res & Single Bus EUCL Rates at last PCI Update		3.50	3.50	
240	Lifeline Rates at last PCI Update		3.50	3.50	
250	Sp Access Surch Rates at last PCI Update		25.00	25.00	
255	Other CCL Revenues		0	C	
260	CL Revenue at Capped (t-1) Rates		738,931,979	739,186,587	
STEP 2					
270	CCL Revenue at Capped (t-1) Rates		738,931,979	739,186,587	
280	CCL MOU for Base Year	(Ln100+Ln110+Ln130+Ln140)	27,201,270,101	27,201,270,101	
290	CL Rev/MOU(t-1)	(Ln 270/Ln 280)	0.027165	0.027175	
STEP 3					
0,12. 0					
300	CL PCI (t)		85.9844%	85.9844%	
	CL PCI (t) CL PCI (t-1)		85.9844% 86.0149%	85.9844% 86.0149%	
300	. ,	(1.0 + (Ln 300/Ln 310))			
300 310 320	CL PCI (t-1)	(1.0 + (Ln 300/Ln 310)) (Ln 290 * Ln 320)	86.0149%	86.0149% 0.99964	
300 310 320	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t)	·	86.0149% 0.999645	86.0149% 0.99964	
300 310 320 330	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t)	(Ln 290 * Ln 320)	86.0149% 0.999645	86.0149% 0.99964 0.02716	
300 310 320 330 STEP 4	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t)	(Ln 290 * Ln 320)	86.0149% 0.999645 0.027156	86.0149% 0.999645 0.027165 545,523,943	
300 310 320 330 STEP 4 340	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI	(Ln 290 * Ln 320) L = 5.10	86.0149% 0.999645 0.027156 530,152,233	86.0149% 0.999645 0.027165 545,523,943 27,201,270,10	
300 310 320 330 STEP 4 340 350	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year	(Ln 290 * Ln 320) L = 5.10	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101	86.0149% 0.999645 0.027165 545,523,943 27,201,270,100 1.000000	
300 310 320 330 STEP 4 340 350 360	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2	(Ln 290 * Ln 320) L = 5.10 (Ln 280)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000	86.0149% 0.999645 0.027165 545,523,943 27,201,270,10 1.000000 0.020055	
300 310 320 330 STEP 4 340 350 360 370	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360))	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490	86.0149% 0.999645 0.027165 545,523,943 27,201,270,10 1.000000 0.020055	
300 310 320 330 STEP 4 340 350 360 370 380	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360))	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490	86.0149% 0.999648 0.027169 545,523,943 27,201,270,10 1.000000 0.02005 0.007110	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666	86.0149% 0.999648 0.027169 545,523,943 27,201,270,10 1.000009 0.02005 0.007119	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728	86.0149% 0.99964! 0.02716! 545,523,94: 27,201,270,10 1.00000 0.02005: 0.00711! 27,201,270,10 193,400,53	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) Chargeable Originating MOU	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034	86.0149% 0.999648 0.027168 545,523,948 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410 420	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034 116,622,390	86.0149% 0.99964 0.02716 545,523,94 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03 116,622,39	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410 420 430	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034 116,622,390 91,895,338	86.0149% 0.99964 0.02716 545,523,94 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03 116,622,39 76,778,14	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410 420 430 440	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034 116,622,390 91,895,338 15,187,008,105	86.0149% 0.99964 0.02716 545,523,94 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03 116,622,39 76,778,14 15,187,008,10	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410 420 430 440 450	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU Hypothetical Prem Term Rate Cap#1(Prem Orig=.01)	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120) (Ln 430/Ln 440)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034 116,622,390 91,895,338 15,187,008,105 0.006051	86.0149% 0.99964 0.02716 545,523,94 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03 116,622,39 76,778,14 15,187,008,10 0.00505	
300 310 320 330 STEP 4 340 350 360 370 380 STEP 5 390 400 410 420 430 440	CL PCI (t-1) 1+% Change CL PCI CL Revenue/MOU (t) Base Demand * Proposed SLC's Prescribed '92 EUCI CCL MOU for Base Year 1+g/2 SLC Revenue/MOU (t) CCL Revenue/MOU (t) CCL Revenue/MOU (t) CCL Rev at CCL Rev/MOU (t) Chargeable Originating MOU Originating CCL Rev (rate = .01) Residual CCL Rev Chargeable Terminating MOU	(Ln 290 * Ln 320) L = 5.10 (Ln 280) (Ln 340/(Ln 350 * Ln 360)) (Ln 330 - Ln 370) (Ln 280) (Ln 380 * Ln 390) (Ln 150) (Ln 410 * .01) (Ln 400 - Ln 420) (Ln 120)	86.0149% 0.999645 0.027156 530,152,233 27,201,270,101 1.000000 0.019490 0.007666 27,201,270,101 208,517,728 11,662,239,034 116,622,390 91,895,338 15,187,008,105	86.0149% 0.99964 0.02716 545,523,94 27,201,270,10 1.00000 0.02005 0.00711 27,201,270,10 193,400,53 11,662,239,03 116,622,39 76,778,14 15,187,008,10 0.00505 26,849,247,13	